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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

*In re Wells Fargo Mortgage  
Discrimination Litigation*

Case No. 3:22-cv-00990-JD

Hon. James Donato

**STIPULATION OF DISMISSAL WITHOUT  
PREJUDICE OF DEFENDANTS WELLS  
FARGO & CO. AND WELLS FARGO HOME  
MORTGAGE**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) and Local Rule 7-12, Plaintiffs Aaron Braxton, Paul Martin, Gia Gray, Bryan Brown, Elretha Perkins, Christopher Williams, Ifeoma Ebo and Terah Kuykendall-Montoya and Defendants Wells Fargo Bank, N.A., Wells Fargo & Co., and Wells Fargo Home Mortgage through their respective counsel, hereby stipulate:

WHEREAS, this action originally consisted of six putative class actions that were consolidated by order dated January 18, 2023, and an amended and consolidated class action

1 complaint was filed on March 24, 2023.

2 WHEREAS, the amended and consolidated class action complaint names as defendants each  
3 of Wells Fargo Bank, N.A., Wells Fargo & Co., and Wells Fargo Home Mortgage.

4 WHEREAS, following meet and confer discussions among counsel, the parties agree that all  
5 claims against Defendants Wells Fargo & Co. and Wells Fargo Home Mortgage may be dismissed  
6 without prejudice and both may be dismissed as parties to this action without prejudice.

7 WHEREAS, the parties agree that nothing in this stipulation should be construed as a waiver  
8 of the parties' ability to take discovery in this action as otherwise permitted by the Federal Rules of  
9 Civil Procedure.

10 **NOW THEREFORE IT IS STIPULATED AND AGREED** that Defendants Wells Fargo &  
11 Co. and Wells Fargo Home Mortgage are dismissed as parties to this action and all claims against  
12 them are dismissed without prejudice.

13  
14 DATED: May 2, 2023

**WINSTON & STRAWN LLP**

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DATED: May 2, 2023

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*Interim Lead Class Counsel for Plaintiffs*

**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(h)(3)**

Pursuant to Civil Local Rule 5-1(h)(3), the filer of this document attests that concurrence in the filing of this document has been obtained from the signatories above.

By: /s/ Amanda L. Groves  
Amanda L. Groves